

22 November 2025

Department of Information and Communications Technology  
Office of the Secretary  
DICT Building, C.P. Garcia Avenue  
Diliman, Quezon City 1101  
Philippines

**RE:    *Comments of ACT | The App Association, Draft Executive Order Modernizing the Data Classification Framework of the Government***

On behalf of ACT | The App Association and the countless small digital-economy businesses we represent, we submit the following comments on the draft Executive Order (EO) on Modernizing the Data Classification Framework of the Government. We appreciate the opportunity to provide input and recognize the Philippine government's important goals of strengthening cybersecurity, combating cybercrime, and protecting the personal information of Filipinos and government institutions.

As small businesses with limited resources, we are concerned about the very short timeframe provided to review and comment on the draft. We respectfully request that DICT accept these initial observations and consider allowing additional time for a more comprehensive review, along with continued stakeholder engagement as the policy evolves.

We welcome the revisions in the draft EO that aim to strike a balance between safeguarding national interests and enabling the cross-border data flows that small digital businesses rely on for innovation, global competitiveness, and efficient service delivery. However, we remain concerned about the broad requirement to store top secret, secret, and—in many cases—confidential government data exclusively within the Philippines.

For small businesses, mandatory data localization can reduce—not enhance—security. Restricting access to global cloud infrastructure limits the use of world-class cybersecurity tools, reduces redundancy, and increases vulnerability to system outages, targeted attacks, and natural disasters. It also forces both government agencies and their private-sector partners to duplicate infrastructure locally, driving up costs and slowing digital transformation—burdens that fall hardest on small and growing companies.

We also wish to underscore the implications of including private entities within the scope of the EO (Section 2) to the extent that they process, store, or handle government data. As drafted, this broad language could unintentionally capture a wide range of routine commercial services—for

example, life insurance providers serving government employees. During the November 19, 2025 public consultation, DICT clarified that such expansive coverage was not the intended purpose. We respectfully request that the text of the EO be revised to reflect that intent clearly.

Thank you for the opportunity to provide input. ACT | The App Association and our member small businesses stand ready to serve as a resource to DICT as it continues work to protect cybersecurity and privacy while supporting a thriving digital economy.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Scarpelli', with a stylized flourish at the end.

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